



with the said organic electroluminescent layer” (claim 3)	contact with the organic electroluminescent layer”
U.S. Patent No. 9,256,311	
“computer readable non-transitory storage media” (claim 7)	“a tangible computer-readable storage media possession structure, which (1) may be volatile, non-volatile, or a combination of volatile and non-volatile, but (2) may not be a propagating electrical or electromagnetic signal per se, including but not limited to semiconductor-based integrated circuits”

## II. PROPOSED CLAIM CONSTRUCTIONS BY EACH PARTY FOR THE DISPUTED CLAIM TERMS (P.R. 4-3(A)(2))

Pursuant to P.R. 4-3(b), the Parties’ proposed constructions of disputed terms are provided in the chart below. The Parties’ proposed constructions are also set forth in the accompanying Exhibit A, along with the intrinsic and extrinsic evidence on which the parties intend to rely.

<i>Term / Phrase</i>	<i>Solas’s Proposed Construction</i>	<i>Defendants’ Proposed Construction</i>
U.S. Patent No. 7,446,338		
“transistor array substrate” (claim 1)	“layered structure upon which or within which a transistor array is fabricated”	“a layered structure composed of a bottom insulating layer through a topmost layer on whose upper surface electrodes are formed, which contains an array of transistors”
“project from a surface of the transistor array substrate” (claim 1)	“extend from a surface of the transistor array substrate”	“extend above the upper surface of the transistor array substrate”

“the pixel electrodes being arrayed along the interconnections between the interconnections on the surface of the transistor array substrate” (claim 1)	“the pixel electrodes are arrayed along the interconnections and located between the interconnections that are on the surface of the transistor array substrate”	“the pixel electrodes are arrayed along the interconnections and located between the interconnections, and the pixel electrodes are on the surface of the transistor array substrate”
“write current” (claim 1)	No construction required	“pull-out current”
U.S. Patent No. 9,256,311		
“configured to wrap around one or more edges of a display” (claims 1 and 7)	No construction required	“wrapped around one or more line segments where two surfaces of a display intersect”

### **III. ANTICIPATED LENGTH OF TIME NEEDED FOR THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(3))**

The parties estimate that about three hours will be needed for the claim construction hearing.

The parties agree that each side will be allocated half of the total time permitted for the hearing.

### **IV. PROPOSED WITNESSES TO BE USED AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(4))**

No party proposes to call witnesses at the claim construction hearing.

### **V. OTHER ISSUES TO BE ADDRESSED PRIOR TO CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(5))**

Plaintiffs’ Position: Solas is not currently aware of any issues that it would propose taking up at a prehearing conference prior to the claim construction hearing.

Defendants’ Position: Defendants respectfully request that the Court hear Defendants’ Motion to Stay Pending IPR (Dkt. No. 56), which has been fully briefed.

Dated: January 28, 2020

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**CERTIFICATE OF SERVICE**

I certify that on January 28, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3)(A).

/s/ Reza Mirzaie